



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPOLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

HRD08/2156 K

February 2, 2009

Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Honolulu High-Capacity Transit Corridor Project, Draft Environmental Impact Statement/Section 4(f) Evaluation, Island of O'ahu, Honolulu and Ewa Districts

Aloha e Wayne Y. Yoshioka,

The Office of Hawaiian Affairs (OHA) is in receipt of the above-mentioned letter dated November 12, 2008. The Department of Transportation Services – City and County of Honolulu (DTS) has submitted a copy of the Draft Environmental Impact Statement/Section 4(f) Evaluation (Draft EIS) for the Honolulu High-Capacity Transit Corridor Project (Project) to our office for review and comment. OHA has reviewed the project and offers the following comments.

The Draft EIS was prepared pursuant to the National Environmental Policy Act (NEPA), Section 4(f) of the U.S. Department of Transportation Act of 1966, Hawaii Revised Statutes (HRS) Chapter 343 and the Hawaii Administrative Rules, Title 11, Chapter 200. The review of this Draft EIS was triggered by both state and federal environmental and transportation policy laws and thus our comments on this document will reflect these laws and policies. OHA would also like to note that Section 106 consultation, pursuant to the National Historic Preservation Act of 1966 (NHPA), has also been triggered by this proposed action and is being conducted concurrent to the Draft EIS/Section 4(f) Evaluation.

The Role of OHA

OHA has substantive obligations to protect the cultural and natural resources of Hawai'i for its beneficiaries, the people of this land. The HRS mandate that OHA "[s]erve as the principal public agency in the State of Hawaii responsible for the performance, development, and

coordination of programs and activities relating to native Hawaiians and Hawaiians; . . . and [t]o assess the policies and practices of other agencies impacting on native Hawaiians and Hawaiians, and conducting advocacy efforts for native Hawaiians and Hawaiians.” (HRS § 10-3)

By direction of the statutory mandates, OHA continues to conduct advocacy efforts to protect the traditional cultural landscapes of Hawai‘i. This includes the protection of archeological and historic resources, the perpetuation of traditional and cultural practices, and the continued health of our terrestrial and marine ecosystems. The dialogue that has played out in the decision on whether the City should pursue the largest public works project in the history of the State of Hawai‘i has been controversial and widely publicized. OHA seeks not to weigh in on the controversial merits of development but seeks to assess the potential impacts that the Project will have on the landscape of the transit corridor.

Public Hearings for the Draft EIS

OHA is deeply concerned with format of the public hearings during the Draft EIS process. The public meetings were scheduled for 2 hours, but the local media reported that the first meeting on December 6, 2008 ended after thirty-one minutes. It was also reported that only ten residents offered testimony during the first meeting on December 6, 2008. OHA staff was able to attend the December 11, 2008 public hearing for the Draft EIS at Bishop Museum at 6:00pm. The meeting started shortly after 6:00pm with public comments being accepted at 6:05pm after a brief introduction by the project staff. After three members of the public offered testimony, the public hearing was officially closed at 6:12pm.

Our staff is concerned that members of the public who were not able to make it to the meetings on time may not have been afforded the opportunity to comment during these public meetings. Residents are often faced with many hardships, have many responsibilities and time commitments, may go to great lengths in order to attend public meetings, and are not always able to make the meetings precisely on time. The public should have been allowed to offer comments on the proposed project during the full two hours that was allotted and advertised for public comment.

Archeological, Cultural, and Historic Resources

Archeological, cultural, and historic preservation laws and regulations provide a regulatory context from which these resources will be identified, evaluated, and treated. As the Project is federally regulated by the NHPA, and its implementing regulation 36 CFR 800, an early determination of “adverse effects toward historic properties” was determined by the DTS and the Federal Transit Authority.

As a result of the determination of “adverse effects toward historic properties”, a Memorandum of Agreement (MOA) is being developed to address the adverse effects toward historic properties. According to the consultation process described in the EIS, the process would involve the State Historic Preservation Division (SHPD) and other consulting parties in discussions regarding adverse effects on historic properties resulting in an MOA.

To our knowledge, consultation with the SHPD and the O'ahu Island Burial Council (OIBC) has been taking place in recent months and the development of an MOA has been progressing. OHA asks that our office be included as a consulting party to the MOA, as OHA is a specifically named Native Hawaiian Organization in the NHPA. As Section 106 consultation has commenced with our office, we further request that consultation continue with our agency. Early and continued consultation with all parties of the MOA shows a proactive effort is being made by the lead agencies responsible for consultation under Section 106 regulations.

According to the Draft EIS, a phased approach to identify archeological resources, including burials will be used in the Project. As a phased archeological inventory survey will be completed as the project commences, the extent of archeological resources that may be present is yet to be seen. Therefore, a Programmatic Agreement (PA) is being developed by the leads of the Project which will stipulate the full extent of responsibilities prior to each construction phase, identify invited concurring signatories, and provide direction on mitigation of adverse effects. OHA would like to be offered an opportunity to review and provide comment on the PA upon its completion.

Mitigation measures for any potential archeological resources that may be affected during construction include archeological monitoring, preserving archeological resources, and burial treatment. Subsurface archeological resources including burials could be impacted by construction. OHA advocates for archeological monitoring in any ground disturbing activities associated with the project. At the very least, archaeological monitoring should be performed in areas identified with a "Moderate" and "High" rating. Because an archeological monitoring plan is yet to be drafted and released we request to be provided this plan for review and comment upon completion. An approved archeological monitoring plan pursuant to the MOA should be enacted to set up a process to handle any archeological resources or iwi kūpuna that may be unearthed during construction.

OHA request DTS's assurances that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during the construction of the project, work will cease, and the appropriate agencies will be contacted pursuant to applicable law. OHA would also like to be notified at that time.

Natural Resources

During early consultation for this project, concerns were expressed about the ko'oloa'ula (*Abutilon menziesii*), commonly known as the red 'ilima. The ko'oloa'ula is an endangered plant which is known to inhabit areas of Kapolei. The federal government is currently implementing a conservation plan for this endangered plant. OHA notes that the proposed project would encroach into within 200 feet of an established contingency reserve contained within a habitat conservation plan of these endangered plants. (DEIS, page 4-119) OHA realizes that mitigation measures have been specified for this habitat conservation plan that include future developments; however, we recommend that the incidental take license be reviewed to ensure that this particularly large and unique proposal will comply with specified measures previously determined. Therefore, we urge that the DTS reconsider their assertion of a finding of no effect

on any threatened, endangered or protected species (DEIS, page 4-125) until this is done. Also, has the DTS consulted with the U.S. Fish and Wildlife Service regarding seabird attraction preventative measures and incorporated them into their design plans? We would like to see a copy of DTS's Section 7 consultation.

Contaminated Sites

As the DEIS states on page 4-113, there are a number of properties proposed to be used that are contaminated. DTS should assess whether chemicals of potential concern are present in shallow soil or groundwater at these sites. If allowed to go forward, remediation of the contaminated areas before deconstruction will likely be necessary. Additionally, long-term biological and chemical monitoring should be established to measure any change in contaminant levels over time and the associated biological response.

OHA does appreciate that DTS proposes permanent best management practices (BMPs) to address water quality that include an inspection and maintenance plan to ensure that they are attaining their objectives. (DEIS, page 4-132)

Stormwater

Generally, OHA wishes to see stormwater as a resource to be captured and conserved rather than a nuisance to be channeled and drained away. The use of permeable paving materials can be used to retain some of the rain that falls, and catch basins can capture and help to slow the runoff thereby reducing turbidity. We hope that DTS can incorporate these ideas into their water management system, which already includes some of these concepts.

Pearl Harbor National Wildlife Refuge and Wetlands

OHA notes that the Pearl Harbor National Wildlife Refuge is listed habitat for endangered fauna and it exists within the project corridor. (DEIS, pages 4-123) In fact, DTS proposes to put a possible "maintenance and storage facility" (DEIS, page 4-132) a mere 1,000 feet from this protected habitat. OHA appreciates that the wetlands are to remain intact (DEIS, page 4-126); however, this in no way ensures that there will be no adverse effects to them.

For example, OHA sees that DTS proposes to fill in some wetlands. (DEIS, page 4-128) We also point out that the Draft EIS plainly states that this "maintenance and storage facility will include an increased level of BMPs because it would be the system's most industrial facility." (DEIS, page 4-132, emphasis added) OHA urges that strict BMPs should apply to this type of facility no matter where it is located and that since this is a "possible" location, placing it next to endangered species habitat is not the best citing for it. We recommend that alternative locations be analyzed in the EIS.

OHA seeks clarification that the classification of the receiving state waters for this estuary is Class 2. As such, we point out that DTS must be aware of the obligations to protect these waters for recreation, aquatic life (and wildlife), water supplies, and that any discharge must receive the best degree of treatment compatible with this class. Further, no new treated sewage discharges shall be permitted within estuaries. OHA notes that the Pearl Harbor estuary

will be impacted by this proposal and regardless of the current state of the water quality of any of the receiving waters; it is not to serve as an excuse for DTS to shirk their obligations. We also ask about compatibility with section 320 of the Clean Water Act and its associated National Estuary Program.

Energy

OHA would also like to point out that Hawai'i is re-inventing its energy portfolio. As such, DTS should consider that by 2020, 20% of Hawai'i's electricity is to be from renewable sources. Further, on January 28, 2008, Assistant Secretary of the Department of Energy and Governor Linda Lingle signed a groundbreaking Memorandum of Understanding (MOU) between the state government and the U.S. Department of Energy's Office of Energy Efficiency and Renewable Energy. The MOU estimates that Hawai'i can potentially meet between 60 and 70 percent of its future energy needs from clean, renewable energy sources.

As such, the legislature has recommended applicants consider the Leadership in Energy and Environmental Design (LEED) Green Building Rating System, which is the nationally accepted benchmark for the design, construction, and operation of high performance green buildings. OHA recommends the use of photovoltaic and small wind harvesting electrical generation for peripheral uses such as parking lot lighting. Solar energy should also be incorporated into the building plans. During construction, OHA urges the use of recyclable materials: steel studs and structural members, and wood products from certified sustainable sources. Landscaping should include native species and large trees to provide shade and cooling to buildings as well as parking lots. Additionally, state agencies are regulated by HRS §196-9 dealing with energy efficiency and environmental standards for state facilities, motor vehicles, and transportation fuel. Although the DTS is not obligated to adhere to this statute, as it is not a state agency, any efforts by your agency to comply with the standards set forth in the statute would show a good faith effort to minimize the impact that the Project will have on energy consumption.

Environmental Justice Concerns

OHA expresses some concern over the situation with the 100 percent minority Banana Patch community that will be dramatically affected by this proposal. OHA agrees that this community is unique and we recognize that this tight-knit community has been living there for generations. Displacement of this entire community is something that will have to be adequately addressed. We also point out that the residents of this area (who do not have access to basic infrastructure services such as water and sewage) are living in multi-generational housing, mainly as a result of economic circumstance, not so much as a result of cultural influences. (DEIS, page 4-55)

Signage as a Tool for Preservation

When cultural resources are affected, effective documentation of the resources and the cultural landscape in which it is located in should be considered as a mitigation measure. Signage related to the preservation of resources or the location of a relocated or displaced resource should be considered in order to preserve the history and culture of a landscape. This

mitigation measure could also have the potential to develop economic or community-based activities which would benefit the local communities that will be affected by the Project. Consultation regarding this matter could be conducted with local community organizations and local Hawaiian Civic Clubs.

Visual and Aesthetics Concerns

There is no doubt that the Project will create and produce visual and aesthetic effects on the landscapes within the transit corridor. Mitigation measures discussed in the DEIS focus on preserving visual resources and enhancing the project design to comply with applicable policies. The DEIS includes measures to consult with the communities surrounding each station for input on station design elements. OHA supports this measure and recommends consultation with each respective community's Neighborhood Board and Hawaiian Civic Club.

Many residents have expressed concerns over the visual and aesthetic impacts that the proposed project will have on the landscape. As a form of mitigating the effects the proposed project will have on the cultural landscape, we advocate that native plants should be incorporated into the landscaping and vegetation plans around the rail transit corridor including the transit stations when at all possible. Landscaping with native plants furthers the traditional Hawaiian concept of mālama 'āina and creates a more Hawaiian sense of place. This concept is one small way the cultural landscape can be preserved in an urban setting.

Thank you for the opportunity to comment. If you have further questions, please contact Jason Jeremiah by phone at (808) 594-1816 or e-mail him at jasonj@oha.org.

'O wau iho nō me ka 'ōia'i'o,



Clyde W. Nāmu'o
Administrator

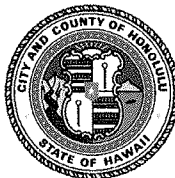
C: Ted Matley
FTA Region IX
201 Mission Street, Suite 1650
San Francisco, California 94105

Katherine Puuna Kealoha, Director
Office of Environmental Quality Control
Hawai'i State Department of Health
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

MUFI HANNEMANN
MAYOR



WAYNE Y. YOSHIOKA
DIRECTOR

SHARON ANN THOM
DEPUTY DIRECTOR

June 11, 2010

RT2/09-298689R

Mr. Clyde W. Namuo, Administrator
Office of Hawaiian Affairs
State of Hawaii
711 Kapiolani Boulevard, Suite 500
Honolulu, Hawaii 96813

Dear Mr. Namuo:

Subject: Honolulu High-Capacity Transit Corridor Project
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address your comments regarding the above-referenced submittal:

Public Hearings for the Draft EIS

All five Public Hearings on the Draft EIS were scheduled for two hours each. Though the Public Hearing Officer's section of hearing oral testimony from the public closed prior to the end of the meetings because of lack of public comment, the Public Hearing Officer stayed through the entire two-hour scheduled Hearing and would have been able to reconvene the Hearing if requested by a member of the public wishing to provide comment. In addition, individuals were able to speak with a court reporter to make official comments and/or place written comments into the record for the entire two-hour time period the Hearing was scheduled for. Thus, the public was allowed to offer comments for the entire two hours that were allotted and advertised to the

public. In addition, comments were accepted on the website and in writing through February 6, 2009.

Archaeological, Cultural, and Historic Resources

FTA has extended an invitation to OHA to be a concurring party to the Programmatic Agreement (PA).

The PA prepared for this Project is included as Appendix H, Section 106 of the National Historic Preservation Act Programmatic Agreement, in this Final EIS. OHA has been a consulting party throughout the Section 106 process and has been requested to provide input to the process at several points during the process. OHA was invited to and participated in consultation meetings related to development of the PA under Section 106.

Archaeological site investigations will be conducted pursuant to the PA and described in Section 4.16 of the Final EIS. It will include survey plans, survey and coordination. SHPD will be consulted throughout the process.

Pursuant to Hawaii Revised Statutes Chapter 6E, work will stop and SHPD would be contacted at the time of discovery of any iwi kupuna or native Hawaiian cultural or traditional deposits. The City will notify OHA and other interested parties of the discovery and any action taken.

Natural Resources

Although the Project will have no effect on threatened, endangered, and protected species, mitigation will be implemented for the Abutilon plants, kooloaula. A State Incidental Take License for kooloaula was issued on March 18, 2005, to the HDOT. The City will secure a Certificate of Inclusion from the State for the Project. Mitigation measures have already been specified in and HCP for the population of kooloaula, including the establishment of an 18-acre contingency reserve for the plants. Specific measures to protect and offset losses of the kooloaula have been established by the USFWS in the existing HCP. If an HCP is needed or if the existing HCP needs to be amended, the City will implement the measures outline of the USFWS in the new or amended HCP. This will offset impacts to the plant, and there will be no unavoidable adverse environmental effect to the kooloaula. Additionally, prior to clearing and grubbing near the kooloaula contingency reserve, the area will be surveyed. Of any kooloaula are found, a horticulturist approved by DLNR will be given an opportunity to remove the plants and transplant them to the contingency reserve.

Section 4.13, Ecosystems, of this Final EIS explains that the Project will not adversely affect protected migratory waterbirds. Hawaii's waterbirds and migratory birds have adapted to multi-lane elevated freeways with thousands of automobiles, buses, tractor trailers, traveling at random intervals, at a rate that is 10-20 mph faster than the train, see Section 4.13.3, Environmental Consequences and Mitigation [Ecology], in this Final EIS.

As Hawaii's waterbirds and migratory birds have adapted in the past as discussed above, it is, therefore, reasonable to expect that the birds would adapt over time to a fixed rail train that travels at a slower rate of speed (50 mph) than current traffic.

FTA has concluded Section 7 consultation. Appendix F of the Final EIS includes consultation correspondence, including correspondence with the USFWS. The USFWS did not express concern about seabird attraction.

No endangered species have been identified on either of the evaluated maintenance and storage facility sites.

Contaminated Sites

If the Project has to acquire or be built on contaminated property, the contamination will be remediated within the construction limits. The Project will not perform long-term biological and chemical monitoring as that responsibility resides with the responsible party, as described below. Further guidance is included in FTA Circular 5010.1D, which will be followed for the Project. This guidance provides:

"Contaminated Property (including Brownfields). Appropriate due diligence concerning contamination is conducted as a part of the NEPA process and before selection of a contaminated property in a capital project is considered.

Appraisals may consider contamination in determining the market value of the property. The terms, "contamination" and "hazardous material" are interpreted broadly to include all contaminants that can affect property value.

(a) The legal responsibility for hazardous material clean-up and disposal rests with parties within the property title chain and with parties responsible for the placement of the material on the property. Grantees must attempt to identify and seek legal recourse from those potentially responsible parties or substantiate the basis for not seeking reimbursement.

(b) During the NEPA process, the grant applicant will have considered not only the estimated project cost of appropriate remediation (remediation being any action, developed in consultation with appropriate regulatory agencies, to reduce, remove or contain contamination), the applicant will also have considered and taken action regarding the short and long-term liabilities associated with Brownfields, if applicable.

(c) To encourage the complete assessment of contamination prior to Project decision-making, FTA generally will not participate in the remediation of contamination discovered during construction.

(d) The grantee should contact FTA for technical assistance regarding contaminated property."

Stormwater

As noted, the Permanent Best Management Practices (BMPs) Plan will describe practices to be included as part of the Project to address stormwater quality before the water is discharged to streams or existing storm drain systems. The BMPs will promote a natural, low-maintenance, sustainable approach to managing and increasing stormwater quality.

Permanent BMPs, such as bioretention areas, vegetated buffer strips, dry swales, water quality basin, and structural BMPs with oil/water separators will be considered, as needed, during the park-and-ride site and the maintenance and storage facility design process. Selection of permanent BMPs will be site-specific and may be modified as a result of geotechnical data collection during final design.

The discussion of permanent BMPs has been revised in the Final EIS, Section 4.14.3, Environmental Consequences and Mitigation [Water]. As stated in this section, pollution prevention BMPs, such as regular inspection and cleaning of the drainage system, will need to be a part of the stormwater management plan that will be developed during Final Design. Permanent BMPs will be implemented for the maintenance and storage facility and the park-and-ride facilities. Permanent BMPs will also be installed for stormwater that drains from the guideway at all crossings of waterbodies. In some instances, the discharge of stormwater from the guideway may increase stormwater inflow to some waters as a result of rainfall collecting on impervious surfaces where infiltration currently occurs. However, because stormwater quality is not expected to be adversely affected, no streams or downstream marine waters would experience negative effects. Stormwater runoff will be filtered through landscaped median areas and sedimentation collars where possible. Stormwater will be filtered through specially designed bioinfiltration units near water bodies on the HDOH 303(d) list of water quality-limited segments (specifically Sites 4, 12, 18, and 19). In locations where space does not allow for their use, downspout filters will be installed on drains near impaired waters (Sites 7 and 30).

Permanent BMPs will be installed as part of the Project to address stormwater quality before the water is discharged to streams or existing storm drain systems. The BMPs will promote a natural, low-maintenance, sustainable approach to managing and increasing stormwater quality. At a minimum, all stormwater downspouts from the guideway will include erosion control BMPs and energy dissipation devices to prevent any scour of landscaped medians. An integral part of the permanent BMPs will be an inspection and maintenance plan to ensure that the BMPs operate as designed. The Project will consider the use of permeable paving materials in locations where runoff would not be polluted.

Pearl Harbor National Wildlife Refuge and Wetlands

No endangered species have been identified on either of the evaluated maintenance and storage facility sites. As the Project will not adversely affect endangered species, no alternatives have been evaluated. The environmental consequences of the Project, including at the proposed maintenance and storage facilities, are presented in Section 4.13.3 of the Final EIS.

The Army Corps of Engineers Section 404 permit triggers the need for Department Of Health's Clean Water Act, Section 401 Water Quality Certification for the Project.

The Clean Water Branch of the State Department of Health has provided comment on the Draft EIS. Through the individual Section 401 Water Quality Permit, the Clean Water Branch of the State Department of Health will ensure that the State's anti-degradation policy (HAR, Section 11-54-1.1) will be complied with. Permanent BMP's to protect water quality include vegetated swales, retention ponds, and grit removal structures; these are discussed above and in full detail in Section 4.14.3 of the Final EIS.

A large detention basin is proposed for the Leeward Community College Maintenance and Storage Facility Site, the preferred Maintenance and Storage Facility Site. The detention basin will overflow via a new 60-inch drain to the shore of Pearl Harbor at Middle Loch. This site is assigned to a Category IVB because nearshore waters supported, until recently, a mangrove forest. To meet avoidance alternative minimization requirements, structural elements of the drain will not be placed in waters of the U.S. The system will have a permanent oil/water/sand separator prior to the outfall, and any discharge entering Pearl Harbor will meet water quality requirements for the estuary. See Figure 4-63 in Section 4.14.2. Impacts will be limited to infrequent flows generated by large storms. These treated flows will contribute fresh water to the Loch. However, Pearl Harbor is considered to be an estuary because of the restricted exchange with the Pacific Ocean through a narrow mouth, and the substantial freshwater flows from a number of contributing springs and streams draining southern Oahu.

Energy

Future generation of electricity from renewable sources will enable the Project to provide additional reduction in fossil fuels. As a worst-case analysis, the Final EIS evaluates a future scenario where all electricity is generated from fossil fuels. Even in this scenario, fuel consumption islandwide would be lower with the Project in place compared to No Build conditions.

LEED (Leadership in Energy and Environmental Design) standards will be followed for the maintenance and storage facility. There are no applicable LEED standards for the guideway. Where LEED classification is not available, the principles of the U.S. Green Building Council will be followed during the design and construction of the Project to include items such as recycling materials, instituting a waste management plan, use of fly ash in concrete, and using Low-VOC paints and coatings, and many others. Integration of photo-voltaic cells into stations and other project features could reduce net project electricity demand. The Project will incorporate other sustainable design measures, such as the use of native plants. While the Project is not regulated by HRS Chapter 196-9 requirements, DTS supports the intent of the statute by providing an efficient and sustainable system.

Environmental Justice Concerns

There is no reasonable alternative to displacement of the Banana Patch community. DTS has been coordinating with residents of the Banana Patch community since October 2008. Every household has been visited by DTS staff to discuss the Project, and potential relocation assistance.

A special community meeting was held at the Alpha Omega Christian Fellowship Church. Invitations were sent to each Banana Patch community household. At this meeting, a brief presentation was given on the Project and public testimony was recorded by a court reporter. A transcript is included in Appendix A of this Final EIS.

DTS will continue to work with individual property owners to provide relocation services. As stated in this Final EIS in Section 4.4.3, "Relocation services will be provided to all affected business and residential property owners and tenants without discrimination; persons, businesses, or organizations that are displaced as a result of the Project will be treated fairly and equitably." As a whole, the community cohesion is typical of a set of neighbors and is not a particularly tight-knit.

Signage as a Tool for Preservation

As described in the Section 106 PA that is included as Appendix H to the Final EIS, the Project will document and provide cultural context for resources in the study corridor.

Visual and Aesthetic Concerns

The island's unique visual character and scenic beauty was considered in the visual and aesthetic analysis presented in the Draft EIS. The Project will be set in an urban context where visual change is expected and differences in scales of structures are typical. The following mitigation framework will be included in the Project to minimize negative visual effects and enhance the visual and aesthetic opportunities that it creates:

- Develop and apply design guidelines that will establish a consistent design framework for the Project with consideration of local context.*
- Coordinate the project design with City TOD planning and DPP.*
- Consult with the communities surrounding each station for input on station design elements.*
- Consider specific sites for landscaping and trees during the final design phase when plans for new plantings will be prepared by a landscape architect. Landscape and streetscape improvements will serve to mitigate potential visual impacts.*
- Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.*

Section 4.8.3 of the Final EIS, Design Principles and Mitigation includes information related to the mitigation framework described above. Specifically architecture and landscape

Mr. Clyde W. Namuo
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design criteria include guidelines regarding site design, materials and finishes, and lighting, which apply to stations, station areas, and the guideway.

The City and County of Honolulu is conducting workshops with communities where rail stations are proposed. The purpose of the workshops is to engage the public about rail stations and give opportunities to residents to contribute ideas about the appearance of station entryways in their neighborhood. Ideas generated at the workshops will be incorporated into the station planning process.

A landscaping plan has been outlined in the Final EIS in Section 4.8.3 to mitigate visual effects of the Project, including utilization of native plants, and replacement of trees and lost vegetation as appropriate.

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Acceptance of the Final EIS by the Governor of the State of Hawaii and issuance of the Record of Decision under NEPA are the next anticipated actions.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

Enclosure